

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
)	
Defendant.)	

**NOTICE OF FILING MEMORANDUM IN SUPPORT OF MOTION FOR
ENTRY OF ORDER REQUIRING PRODUCTION OF DOCUMENTS AND
INFORMATION AS TO WHICH THE
ATTORNEY-CLIENT PRIVILEGE HAS BEEN WAIVED
AND FOR EXPEDITED BRIEFING,
DECLARATION OF CRAIG T. MERRITT AND
ATTACHED EXHIBITS A - UU**

Plaintiff ePlus, Inc., by counsel, in accordance with the Amended Protective Order entered in this case on November 16, 2009, hereby gives notice that it has filed the following documents **UNDER SEAL** with the Court:

1. Memorandum in Support of Motion for Entry of Order Requiring Production of Documents and Information as to which the Attorney-Client Privilege has been Waived and for Expedited Briefing, and
2. Declaration of Craig T. Merritt, with compact disk containing Exhibits A – UU to the Memorandum in Support of Motion for Entry of Order Requiring Production of Documents and Information as to which the Attorney-Client Privilege has been Waived and for Expedited Briefing.

A copy of the above-mentioned Memorandum, Declaration and Exhibits will be served on counsel for Defendant Lawson Software, Inc. by hand and overnight delivery today.

January 25, 2012

Respectfully submitted,

ePLUS, INC.

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of January, 2012, I will electronically file the foregoing

NOTICE OF FILING MEMORANDUM IN SUPPORT OF MOTION FOR ENTRY OF ORDER REQUIRING PRODUCTION OF DOCUMENTS AND INFORMATION AS TO WHICH THE ATTORNEY-CLIENT PRIVILEGE HAS BEEN WAIVED AND FOR EXPEDITED BRIEFING, DECLARATION OF CRAIG T. MERRITT AND EXHIBITS A – UU

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

<p>Daniel J. Thomasch, <i>pro hac vice</i> Gibson, Dunn & Crutcher LLP 200 Park Avenue New York, NY 10166-0193 (212) 351-3800</p> <p>Jason C. Lo, <i>pro hac vice</i> Gibson, Dunn & Crutcher LLP 333 South Grand Avenue Los Angeles, CA 90071-3197 (213) 229-7153 VAED-620ExternalServiceList@gibsondunn.com</p>	<p>Daniel McDonald, <i>pro hac vice</i> Kirsten Stoll-DeBell, <i>pro hac vice</i> William D. Schultz, <i>pro hac vice</i> Rachel C. Hughey, <i>pro hac vice</i> Andrew Lagatta, <i>pro hac vice</i> MERCHANT & GOULD 3200 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 332-5300 Facsimile: 612) 332-9081 lawsonservice@merchantgould.com</p>
<p>Donald R. Dunner, <i>pro hac vice</i> Erika H. Arner, <i>pro hac vice</i> Finnegan, Henderson, Farabow, Garrett & Dunner, LLP 901 New York Avenue, NW Washington, DC 20001 (202) 408-4000 (202) 408-4400 EXT-Lawson- FinneganCorrespondence@finnegan.com</p>	<p>Robert A. Angle, VSB#37691 Dabney J. Carr, IV, VSB #28679 TROUTMAN SANDERS LLP P.O. Box 1122 Richmond, Virginia 23218-1122 (804) 697-1238 (804) 698-5119 (Fax) robert.angle@troutmansanders.com dabney.carr@troutmansanders.com</p> <p><i>Counsel for Defendant Lawson Software, Inc.</i></p>

/s/

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